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11  
12 IN THE UNITED STATES DISTRICT COURT  
13  
14 DISTRICT OF NEVADA

15  
16 ROBIN LEEANN MOORE-BROWN,  
17 individually, and as Special Administrator of the  
18 Estate of FRED NORRIS BROWN, III; B.B.B., a  
19 minor child d/o/b, 03/12/2009; L.L.B., a minor  
20 child, d/o/b, 12/02/2013; and L.K.B., a minor child,  
21 d/o/b 12/29/2018,

22 Plaintiffs,

23 v.

24 CITY OF NORTH LAS VEGAS (CITY OF  
25 NORTH LAS VEGAS POLICE DEPARTMENT);  
26 ALEXANDER CUEVAS; and DOES 1-10,  
27 inclusive,

28 Defendants.

CASE NO.: 2:20-cv-01649-GMN-DJA

**STIPULATION AND ORDER TO  
EXTEND DISCOVERY  
DEADLINES**

**[SECOND REQUEST]**

29  
30 IT IS HEREBY STIPULATED AND AGREED between Plaintiffs, ROBIN LEEANN  
31 MOORE-BROWN, individually, and as Special Administrator of the Estate of FRED NORRIS  
32 BROWN, III, B.B.B, a minor child d/o/b, 03/12/2009, L.L.B, a minor child, d/o/b, 12/02/2013  
33 and L.K.B, a minor child, d/o/b, 12/29/2018 (collectively hereinafter “Plaintiffs”), and  
34 Defendants CITY OF NORTH LAS VEGAS (CITY OF NORTH LAS VEGAS POLICE

1 DEPARTMENT) (“CNLV”) and ALEXANDER CUEVAS (“CUEVAS”) (collectively  
2 hereinafter the “PARTIES”), by and through their counsel of record, that the discovery cut-off  
3 date of August 26, 2021, be continued for a period of sixty (60) days up to and including  
4 October 25, 2021, for the purpose of allowing the parties to complete the depositions of experts  
5 and plaintiff.

6 **I. DISCOVERY COMPLETED TO DATE**

7 Defendants served their Initial Disclosure of Documents and Witnesses on December  
8 23, 2020, First Supplement on April 29, 2021.

9 Plaintiffs served their Initial Disclosure of Documents and Witnesses on January 15,  
10 2021, First Supplement on March 25, 2021, Second Supplement on May 26, 2021, Third  
11 Supplement on June 10, 2021.

12 Plaintiffs have propounded one set of Interrogatories and Request for Production of  
13 Documents on Defendant City of North Las Vegas and one set of Interrogatories and Request  
14 for Production of Documents on Defendant Alexander Cuevas. Defendants served their  
15 responses on April 29, 2021.

16 Defendants have propounded one set of Interrogatories and Requests for Production of  
17 Documents on Plaintiffs. Plaintiffs served their responses on May 26, 2021.

18 Plaintiffs served their Designation of Expert Witnesses on June 28, 2021.

19 Defendants served their Designation of Expert Witness on June 28, 2021.

20 Deposition of Defendant Officer Alexander Cuevas was taken on July 8, 2021.

21 Deposition of Officer Chasity Smith was taken on July 8, 2021.

22 **II. DISCOVERY YET TO BE COMPLETED**

23 The parties anticipate the necessity of taking depositions of expert witnesses and  
24 plaintiff.

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1           **III. REASONS WHY REMAINING DISCOVERY HAS NOT YET BEEN**  
 2           **COMPLETED**

3           The parties have been diligent in conducting discovery in this matter, and only have  
 4           depositions left to be completed, two of which have been scheduled: the deposition of Expert  
 5           Ken Katsaris is scheduled to take place on October 12, 2021 and the deposition of Expert  
 6           Roger Clark is scheduled to take place August 25, 2021. The coordination of the experts'  
 7           schedules has been difficult. As such, additional time is needed due to these issues.

8           **IV. PROPOSED EXTENDED DEADLINES**

9           The parties respectfully request this Court enter and order as follows:

10           **A. Discovery Deadline.**

11           The current discovery cutoff date of August 26, 2021 should be extended for a period  
 12           of sixty (60) days, up to and including October 25, 2021.

13           **B. Experts and Rebuttal Experts.**

14           The parties have disclosed expert witnesses.

15           **C. Dispositive Motions.**

16           The parties shall file dispositive motions thirty (30) days after the close of discovery, on  
 17           November 24, 2021.

18           **D. Joint Pre-Trial Order.**

19           The parties shall submit the Joint Pretrial Order, pursuant to LR 26(1)(e)(5) thirty (30)  
 20           days after the date set for filing dispositive motions, on December 24, 2021, unless dispositive  
 21           motions are filed, in which case the date for filing the Joint Pretrial Order shall be suspended  
 22           until thirty (30) days after the decision on the dispositive motions or further order of this Court.

23           This request for an extension is made in good faith and joined by all the parties in this  
 24           case. The request is timely pursuant to LR 26-3; well in advance of any current deadline. Trial  
 25           is not yet set in this matter and dispositive motions have not yet been filed. Accordingly, this  
 26           extension will not delay this case. Moreover, since this request is a joint request, neither party  
 27           will be prejudiced by this extension.

28           ///

1 will be prejudiced. The extension will allow the parties the necessary time to complete  
2 discovery.

3 DATED: August 18, 2021

4 NORTH LAS VEGAS CITY ATTORNEY

5  
6 By /s/ Noel E. Eidsmore.  
7 Micaela Rustia Moore, Nev. Bar No. 9676  
8 City Attorney  
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12 *Attorneys for Defendants*

DATED: August 18, 2021

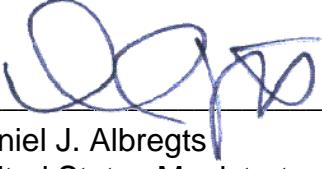
PETER GOLDSTEIN LAW CORP

5  
6 By /s/ Peter Goldstein.  
7 Peter Goldstein, Nev. Bar No. 6992  
10161 Park Run Drive, Suite 150  
11 Las Vegas, Nevada 891145  
12 *Attorneys for Plaintiffs*

13 **ORDER**

14 IT IS SO ORDERED.

15 DATED this 19th day of August 2021.

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19 Daniel J. Albregts  
20 United States Magistrate Judge  
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